

Remarks/Arguments

Claims 1 and 14 have been amended to correct an obvious error. Two paragraphs of the summary of the invention, on page 2, have been amended to correct the same error. It is apparent, from Figure 1 of the instant drawing, that interworking function 105 is disposed on the wireless local area network side of mobile communications network 165.

Claims 1 to 8 and 14 to 20 have been rejected under 35 USC 102(b) as unpatentable over US 6,243,581 to Jawanda. The Applicants submit that Claims 1 and 14 as amended are patentable over Jawanda.

Jawanda provides seamless roaming between networks by providing simultaneous wireless connections between the networks. A network arbitrator selects the network with greater data bandwidth.

Nowhere does Jawanda show or suggest:

“providing an interworking function disposed on the wireless local area network side of the mobile communications network”,

as specifically recited in Claim 1 as amended. Rather, in Jawanda, IWF 36 is disposed on the side of gateway 38 opposite to WLAN 12. Furthermore, nowhere does Jawanda show or suggest:

“connecting the wireless local area network to the mobile communications network by employing the interworking function as an auxiliary radio network controller associated with the mobile communications network”,

as specifically recited in Claim 1. Rather, in Jawanda, IWF 36 couples subsystem 32 to gateway 38. See column 3, lines 18 to 21. It is therefore clear that Jawanda does not affect the patentability of Claim 1.

Similarly, nowhere does Jawanda show or suggest:

“an interworking function disposed on a wireless local area network side of the mobile communications network”,

as specifically recited in Claim 14 as amended. Rather, in Jawanda, IWF 36 is disposed on the side of gateway 38 opposite to WLAN 12. Furthermore, nowhere does Jawanda show or suggest:

“connecting the wireless local area network to the mobile communications network using the interworking function as a drift radio network controller for the mobile communications network”,

as specifically recited in Claim 14. Rather, in Jawanda, IWF 36 couples subsystem 32 to gateway 38. See column 3, lines 18 to 21. It is therefore clear that Jawanda does not affect the patentability of Claim 14.

Claims 2-8 are dependent from Claim 1 and add further advantageous features. The Applicants submit that these subclaims are patentable as their parent Claim 1.

Similarly, Claims 15-20 are dependent from Claim 14 and add further advantageous features. The Applicants submit that these subclaims are patentable as their parent Claim 14.

No other art has been applied against independent Claims 1 and 14. However, for completeness, the other art relied upon by the Examiner will be discussed:

On page 4 of the Office communication, the Examiner refers to “Chuah”. The Applicants assume that the Examiner meant to refer to US 6,757,293 to Chuah et al.

US 6,757,293 to Chuah et al relates to an UMTS system which supports different bit rates. A soft handoff between base stations is accomplished by simultaneously communicating with two base stations. A frame selecting unit FSU 12 decides which base station provides better frame quality. Interworking functions IWF1, IWF2 and IWFn couple core networks CN to subnetwork 18 and RNC 14 and FSU 12.

Nowhere does Chuah et al show or suggest:

“interworking between a wireless local area network and a mobile communications network”,

as specifically recited in Claims 1 and 14. Furthermore, nowhere does Chuah et al show or suggest:

“providing an interworking function disposed on the wireless local area network side of the mobile communications network, and

connecting the wireless local area network to the mobile communications network by employing the interworking function as an auxiliary radio network controller associated with the mobile communications network”,

as specifically recited in Claim 1. Furthermore, nowhere does Chuah et al show or suggest:

“means for connecting the wireless local area network to the mobile communications network using the interworking function as a drift radio network controller for the mobile communications network”,

as specifically recited in Claim 14. It is therefore clear that Chuah et al does not affect the patentability of Claims 1 and 14.

US 2001/0027490 to Fodor et al relates to an IP network in which communication between users may use QOS definitions for priority. Nowhere does Fodor et al show or suggest:

“interworking between a wireless local area network and a mobile communications network”,

as specifically recited in Claims 1 and 14. Furthermore, nowhere does Fodor et al show or suggest:

“providing an interworking function disposed on the wireless local area network side of the mobile communications network, and

connecting the wireless local area network to the mobile communications network by employing the interworking function as an auxiliary radio network controller associated with the mobile communications network”,

as specifically recited in Claim 1. Furthermore, nowhere does Fodor et al show or suggest:

“means for connecting the wireless local area network to the mobile communications network using the interworking function as a drift radio network controller for the mobile communications network”,

as specifically recited in Claim 14. It is therefore clear that Fodor et al does not affect the patentability of Claims 1 and 14.

It is furthermore clear that even if the disclosures of Jawanda, Chuah et al, and Fodor et al were to be combined, the patentability of independent Claims 1 and 14 would not be affected.

The Applicants have reviewed the art which has been cited but not relied upon. The Applicants consider such art to be no more relevant to Claims 1 and 14 than the art which has been relied upon.

The Applicants therefore submit that the instant application is now in condition for allowance. A notice to that effect is respectfully solicited.

Respectfully submitted,
Shaily Verma et al

____/Daniel E. Sragow/
By: Daniel E. Sragow, Attorney
Reg. No. 22,856
(609) 734-6832

Patent Operations
Thomson Licensing LLC
2 Independence Way
Princeton, NJ 08543-5312
Date: 051409